

Scottish Salmon Watch, 8 June 2020

[Scientific Opposition to Neonicotinoid Use in Salmon Farming](#)



- [Peer-reviewed science details significant impacts on aquatic ecosystems](#)
- Professor Dave Goulson of the University of Sussex: "It would be the height of foolishness to start using this potent, broad-spectrum neurotoxin in salmon farming"
- Imidacloprid is "very toxic to aquatic life.....hazardous to the aquatic environment"
- VMD approached re. Imidacloprid use in salmon farming in 2016 but deny FOI claiming disclosure would "prejudice the commercial interests of the business involved"
- Campaigners call for ban on use of Imidacloprid (BMK08/Ectosan) on Scottish salmon

Scientific research [detailing significant impacts on aquatic ecosystems](#) is being cited by campaigners who are calling for a ban on the use of a toxic neonicotinoid insecticide - [banned by the UK for use in terrestrial farming in 2018](#) - in salmon farming in Scotland.

Imidacloprid is [marketed by Norwegian-owned Benchmark as BMK08 \(formerly named Ectosan\) for use via their 'CleanTreat' system](#) to kill parasitic lice with a [trial by Mowi proposed in March 2020 for a salmon farm at Ardnish in Loch Ailort](#). A report in *Fish Farming Expert* in May 2020 [suggested the trial in Loch Ailort had not taken place](#) but Scottish Salmon Watch [suspects that secret trials may have taken place in Scotland in 2019](#).

Professor David Goulson of the [School of Life Sciences at the University of Sussex and author of 'A Sting in the Tale'](#) said:

"Imidacloprid has been banned from use by farmers because of the widespread environmental harm it caused, which included impacting on freshwater insects. It would be the height of foolishness to start using this potent, broad-spectrum neurotoxin in salmon farming. This proposed CleanTreat® system claims to entirely remove Imidacloprid from the water returned to the sea, but this clearly needs to be tested by an independent laboratory. Imidacloprid is extremely toxic to a broad range of invertebrates, with concentrations of less than 1 part per billion enough to harm aquatic life, so even tiny traces would have major impacts on marine life."

Mark Ruskell, Scottish Green Member of the Scottish Parliament, [wrote in a letter last month to Scotland's Cabinet Secretary for Environment, Climate Change & Land Reform](#):

"I need not remind you that the European Commission previously banned the use of neonicotinoids on plants in 2018 due to its risk to bees. Imidacloprid has been classed as an 'environmental hazard by US government scientists, who have warned that it could be 'very toxic to aquatic life with long lasting effects'. I also understand that the Rivers Trust, which represents river management bodies in England, Wales and Ireland, has warned that neonicotinoids in our rivers endanger the lives of insects, birds and fish. If there is any

evidence at all that Ectosan has a detrimental impact on our marine ecosystems, it is not acceptable for in-situ trials to take place in Scotland's waters."

Scottish Salmon Watch is extremely sceptical of [Benchmark's claim of "zero environmental impact"](#) and today (8 June 2020) [submitted a scientific dossier](#) and [filed a FOI on ecological risk assessments of Imidacloprid use in salmon farming with Scottish Ministers, the Scottish Environment Protection Agency and the Veterinary Medicines Directorate](#) [1].

"Be scared, be very scared about the use of Imidacloprid in salmon farming," cautioned Don Staniford, [Director of Scottish Salmon Watch](#). "The weight of scientific evidence against the use of toxic neonicotinoids in aquatic ecosystems is already so overwhelming that an immediate ban on the use of Imidacloprid in salmon farming - to follow [the ban in terrestrial farming in 2018](#) - is warranted. Benchmark is blowing smoke by claiming that BMK08 will magically disappear leaving 'purified' water to discharge safely into Scottish waters. How can the public and investors trust a company that for years hid the fact that BMK08 - formerly marketed as Ectosan - was the hazardous neonicotinoid insecticide Imidacloprid? That SEPA, the Scottish Government and the VMD are all refusing to disclose basic information on the use of Imidacloprid in salmon farming rings alarm bells. Using Imidacloprid in salmon farming is dangerous, reckless and represents the antithesis of the precautionary principle."

**Honest guv:**  
**ZERO ENVIRONMENTAL IMPACT!**



Scottish Salmon Watch is [challenging Scottish Ministers to drink 'purified' Imidacloprid waste discharges and eat Scottish salmon doused in Imidacloprid to prove it is safe.](#)

"If Donald Trump is willing to drink poisonous disinfectants to guard against Covid-19 then surely Nicola Sturgeon is willing to prove the safety of 'CleanTreat' by drinking the 'purified' waste effluents of Imidacloprid?" said Staniford, author of '[Silent Spring of the Sea](#)'. "Last year, [Scottish Ministers Fergus Ewing and Kates Forbes cheerily tucked into Mowi salmon](#) - will the First Minister do a John Gummer to prove that Scottish salmon marinated in toxic neonicotinoid is safe? Hopefully, consumers will not be so stupid as to fall hook, line and sinker for chemically embalmed Scottish salmon. Boycott toxic Scottish salmon!"



**Contact:**

Don Staniford (07771 541826): [salmonfarmingkills@gmail.com](mailto:salmonfarmingkills@gmail.com)

## Scientific Evidence Against the Use of Imidacloprid

"Researchers from the Imperial College London scanned the brains of bees exposed to Imidacloprid, an insecticide with a similar chemical composition to nicotine," [reported The Press Association in March 2020](#). "They found the key region of the brain that facilitates learning showed reduced growth in the insects exposed to Imidacloprid. The researchers said the findings, [published in the journal Proceedings of the Royal Society B](#), show that residues of this insecticide in flowers and plants can cause permanent brain damage in bees."

A scientific paper - "[Neonicotinoids disrupt aquatic food webs and decrease fishery yields](#)" - published in *Science* in November 2019 reported that "aquatic systems are threatened by the high toxicity and persistence of neonicotinoid insecticides". "In Lake Shinji, neonicotinoids indirectly reduced fishery yields by decreasing the abundance of invertebrates that serve as food for smelt and eels," [concluded the Science paper](#). "Decreased survival, growth, and reproduction of freshwater organisms, particularly aquatic insects and crustaceans, by widespread use of neonicotinoids could alter ecosystem functions related to nutrient transfer from primary producers to secondary consumers, including fish."

Read more via National Geographic's "[How the world's most widely used insecticide led to a fishery collapse](#)"

Professor Masumi Yamamuro of the [Department of Natural Environmental Studies, Graduate School of Frontier Science, The University of Tokyo](#) in Japan (lead author of the [Science paper](#)) told Scottish Salmon Watch:

"As I wrote in my *Science* paper, Imidacloprid is definitely lethal for many Arthropods. I am sure that juvenile salmon in a natural environment depends on Arthropods as foods, so Imidacloprid is not recommended to use. Imidacloprid would cause various bad effects on other animals besides cultured salmon. To avoid such bad effects, I would not personally recommend using Imidacloprid for salmon culture."

"There are many other papers on Imidacloprid," explained Professor Yamamuro. "I searched 'fish' and 'Imidacloprid' and 76 papers were listed. I was astonished that Imidacloprid may directly give bad effects on some fish species."

A [paper presented at Ocean Sciences 2020 in February](#) reported:

"Neonicotinoid insecticides are an emerging contaminant of concern in areas with intensive coastal agriculture where they can be introduced into shallow marine ecosystems". "This study demonstrated differential species sensitivities to a systemic insecticide with macroalgae < sea urchin embryos < amphipods < coral," concluded the paper. "These data suggest that toxic effects of imidacloprid are seen when water concentrations reach ppm levels, but further work should be done considering the effects brought on by bioaccumulation and subsequent ingestion of imidacloprid."

Read more via Hakai magazine's "[What's Bad for Bees Could Be Bad for Marine Life, Too](#)"

A scientific paper [published in the journal Water, Soil & Air Pollution in January 2020](#) concluded: "Imidacloprid is very toxic to the non-target species in the aquatic ecosystem

even at sub-lethal concentrations." A scientific paper [published in PLOS ONE in October 2019](#) showed lethal and sub-lethal effects of Imidacloprid on juvenile brown shrimp.

A scientific paper - "[Neonicotinoid Contamination of Global Surface Waters and Associated Risk to Aquatic Invertebrates: A Review](#)" - published in 2015 reported that neonicotinoids are "highly toxic to a wide range of invertebrates". "Therefore, neonicotinoids represent a significant risk to surface waters and the diverse aquatic and terrestrial fauna that these ecosystems support," stated the paper. "Imidacloprid is by far the most widely studied neonicotinoid (66% of the 214 toxicity tests reviewed) with differences in sensitivity among aquatic invertebrate species ranging several orders of magnitude."

Professor Christy Morrissey of the [School of Environment and Sustainability at the University of Saskatchewan](#) - author of the first experiment to track the effects of a neonicotinoid pesticide on birds in the wild [published in Science in September 2019](#) - told Scottish Salmon Watch:

"I am not very familiar with the marine literature - but I do know there is very little on this area and certainly not enough to conclusively set regulatory limits for marine organisms. At this time, many are using the freshwater guidelines – eg. EFSA or DEFRA to extrapolate risks."

A spokesman for Bayer (who [bought Monsanto in 2018](#) and [launched Imidacloprid back in 1991 with the trade name 'Gaucho'](#)), [told The Guardian newspaper in 2017](#):

"Scientific evidence shows that Imidacloprid has minimal environmental impact when used according to the label, including ingestion by seed-eating songbirds. We take the safety and environmental impact of our products seriously."

Read more via: "[Insect 'apocalypse' in U.S. driven by 50x increase in toxic pesticides](#)"

Benchmark, who [hid Imidacloprid behind the trade names Ectosan and BMK08 before being unmasked by The Ferret in March 2020](#), claim that scientific evidence shows that Imidacloprid as used via 'CleanTreat' is "safe" for the environment and waste safely disposed:



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#### Safety

Years of rigorous trials have been conducted to ensure BMK08 is safe for people, fish and the environment when used as a medicine for the treatment of sea lice on Salmon together with CleanTreat®. The process is regulated by the European Union guidelines and enforced by local country regulators covering the medicine and the environment. The final stage of testing after all safety requirements have been concluded, is full scale Good Clinical Practice (CVMP/VICH/595/98-FINAL) field trials. These trials have been successfully carried out exclusively in Norway proving BMK08 is an effective and safe medicine for the treatment of sea lice. BMK08 is currently in the regulatory process after which we expect to bring this new solution to the market.

#### Medicine removal – CleanTreat® technology

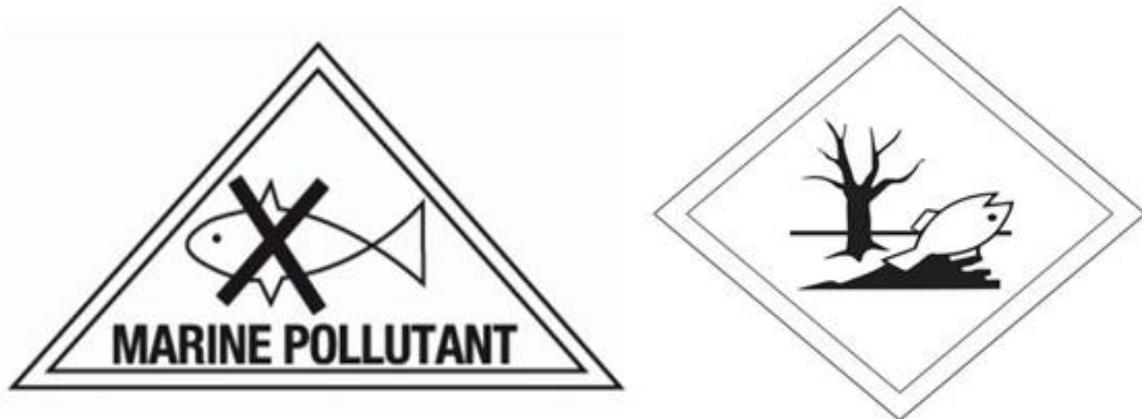
CleanTreat® is a technology developed to remove medicines from treatment water on a large scale. The process has been shown to be effective at removing several classes of medicine from water. BMK08 will only be licenced to be used with the CleanTreat® system.

During the CleanTreat® process the water is constantly tested to ensure only purified water is returned to the sea. A quality certificate will be generated for every use of the system to ensure compliance to the highest standards. Testing is carried out real time onboard the vessels and the purification process is overseen by a team of chemists.

CleanTreat® has the added benefit of removing organic material from the treatment water including sea lice and sea lice egg strings so helping to prevent resistance development against the medicine. The waste, including collected medicine, is removed and incinerated, and certification of the safe disposal of each batch will be issued.

"The treatment, Ectosan, which has been developed by the UK-based company, was delivered through the company's CleanTreat filtering system - which removes any detectable traces of medicine from treatment water before it is discharged into the sea - meaning that the treatments had no environmental impact," [reported Fish Farming Expert in December 2017](#) via the headline "New lice bath '100% effective' and pollution-free".

According to [safety data sheets published by chemical companies](#), [Imidacloprid](#) is a toxic neonicotinoid insecticide - classified as "[very toxic to aquatic life](#)" and "[hazardous to the aquatic environment](#)" [2].



Read more via "[Imidacloprid: A Neonicotinoid Insecticide Toxic to Aquatic Life](#)"

The use of Imidacloprid in shellfish farming in the United States of America was banned in 2018 following scientific concerns. "The science around imidacloprid is rapidly evolving and we can't ignore it", [said Washington State Department of Ecology director Maia Bellon to the Seattle Times in April 2018](#). "New findings make it clear that this pesticide is simply too risky and harmful to be used in Washington's waters and estuaries." [3].

### Secret Salmon Farming

In November 2019, Benchmark re-branded Ectosan as BMK08 but remained silent on its secret identity as Imidacloprid [claiming in a Trading Update that its use via CleanTreat had "zero environmental impact"](#).



In February 2020, Scottish Salmon Watch [appealed to the Scottish Information Commissioner following a FOI refusal by SEPA to disclose basic information.](#)



Read more via: "[Calls for greater transparency over 'toxic' new fish farm product](#)"

Benchmark [refused to publicly admit that BMK08/Ectosan was Imidacloprid until March 2020](#) (after a [press release by Scottish Salmon Watch](#), a report in [The Ferret](#) and [media coverage in the trade press](#)) and have refused requests for a site visit to see their 'CleanTreat' technology in action [4].

A FOI disclosure by the VMD last week (4 June 2020) revealed that the VMD knew about Imidacloprid use in salmon farming as early as 2016 [5].

The following sets out the timeline when Imidacloprid become first known to the VMD in the context of salmon farming.

#### June 2016 and again in October 2017

The VMD first became aware of imidacloprid in the context of salmon farming in June 2016 and again in October 2017. Please note that this interaction was not specifically in the context of Ectosan or CleanTreat but the active substance, imidacloprid. However, we can't say anything more about this as we consider that the disclosure of the information would be likely to prejudice the commercial interests of the business concerned and that Section 43 applies here. Section 43 is subject to a public interest test balance. After careful consideration we have concluded that the public interest in withholding the information strongly outweighs that for disclosure in this case. The information in question refers to the confidentiality afforded to companies when they first engage with regulators. If we identified the source and context of this information, it could in consequence prejudice the commercial interests of the business involved.

Norwegian Fish Farmer reported in June 2016: "[Dette er det nye lusemiddelet Salmo Pharma skal teste ut](#)" (the article [referred to a salmon farming patent for Imidacloprid dated December 2015](#) and [D10-Aquatic Blast](#) which is believed to be the name of Imidacloprid before it was called Ectosan in 2017 and then BMK08 in 2019). The Fish Site reported in June 2017: "[Patent sought for neonicotinoid-based sea louse treatment](#)".

The Norwegian Industrial Property Office (Patentstyret) [featured a patent for Ectosan in 2013](#) (it appears to have been internationally registered in 2011) under "veterinary preparations; disinfectants; preparations for destroying vermin; pesticides" with the patent holder listed as the [FVG \(Fish Vet Group\) - a subsidiary of Benchmark currently up for sale](#) - in Inverness.

patent varemærke design   
**Patentstyret**

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nr 12/13 - 2013.03.18 NO

Norsk varemærketidende

internasjonale varemærkeregistreringer

(111)	Int.reg.nr:	1104453
(151)	Int.reg.dato:	2011.12.03
(180)	Registreringen	2021.12.03
	utløper:	
(210)	Nasj. ref.nr:	201200992
(220)	Notifikasjonsdato:	2012.02.02
(300)	Søknadsprioritet:	2011.06.27, GB, 2585932
(540)	Gjengivelse av merket:	

**ECTOSAN**

(541)	Merket er et	ordmerke i standard font
(730)	Innehaver:	FVG Ltd, 22 Carsegate Road, GB-IV38EX INVERNESS, Storbritannia
(740)	Fullmektig:	Zacco Norway AS, Postboks 2003 Vika, 0125 OSLO, Norge
(511)	Vare-/ tjenestefortegnelse:	Klasse:5 Veterinary preparations; disinfectants; preparations for destroying vermin; pesticides.
	Besluttet gjeldende dato i Norge:	2013.03.13
(450)	Kunngjøringsdato:	2013.03.18

Benchmark [first publicly revealed Ectosan in December 2017](#) (although it did not come clean that it was Imidacloprid publicly [until a media release on 20 March 2020](#) which was prompted by [the revelation in The Ferret on 17 March 2020](#)); [revealing in October 2018](#) that it had "commercial trials in Norway" and [re-naming it BMK08 in November 2019](#).

Fish Farmer [reported in February 2020](#) that: "Over the past 24 months, more than 35,000 tonnes of salmon in five Norwegian farms have been treated with BMK08".

In May 2020, Scottish Salmon Watch [revealed that Mowi had asked the Scottish Environment Protect Agency to support a field trial at their Ardnish salmon farm in Loch Ailort](#).

Ironically, the company promoting the neonicotinoid Imidacloprid is [owned/controlled by Norwegian billionaire Johan Andresen whose empire was funded by tobacco money.](#)

**Don Staniford**  
@TheGAAIA

Meet the filthy rich Norwegian tobacco billionaire [@FerdOwner](#) desperate to 'CleanTreat' parasite-infested farmed salmon with the toxic neonicotinoid insecticide Imidacloprid (BMK08/Ectosan) [@WeAreBenchmark](#) [tinyurl.com/s3fohsb](https://tinyurl.com/s3fohsb) #Salmoney #Salmonopoly [tinyurl.com/ryqfh26](https://tinyurl.com/ryqfh26)

**BENCHMARK**  
Company number 04115910

**SHAREHOLDERS**

% OF ISSUED SHARE CAPITAL
25.98
14.14
9.23
6.91
5.80

**Johan H. Andresen Jr.**  
Chairman of the Board of Ferd

Johan Henrik Andresen is a Norwegian industrialist and investor. Since 1998, Andresen has been the owner of Ferd, one of the largest privately held companies in Norway. He served in the position of CEO from 1998 to 2012, and has been the chairman of the board since 2012. Wikipedia

Born: 25 July 1961 (age 58 years), Oslo, Norway

**Mr Johan Henrik Andresen**  
Correspondence address  
Ferd Capital, Strandveien 50, P.O. Box 100, 0403 Skjervøy, Norway

Notified on  
7 December 2018

1:31 PM · Mar 18, 2020 · Twitter Web App

**Don Staniford**  
@TheGAAIA

"It's the tasty one," said a cigarette ad for Tiedemanns Tobaksfabrik (biggest tobacco company in Norway) [@FerdOwner](#) [tinyurl.com/sq8vr24](https://tinyurl.com/sq8vr24) "Setting a new standard in environmental care for sea lice bath treatments," claims CleanTreat [@WeAreBenchmark](#) #BlowingSmoke #Imidacloprid



Terry A'Hearn and 9 others

10:17 AM · Mar 19, 2020 · Twitter Web App

Read more via:

[Scottish Greens "Deeply Concerned" at Mowi's Field Trial of Neonicotinoid Imidacloprid in Loch Ailort](#)

[Letter to the Prince of Wales re. bee-killing Imidacloprid use at royal warrant holder Mowi Secret Trials: 'Royal' Salmon Doused with Bee-Killing Insecticide Imidacloprid?](#)

[Follow the Salmoney - the Norwegian tobacco billionaire behind the Neonicotinoid Imidacloprid](#)

[BMK08 & CleanTreat](#)

[Benchmark sea lice treatment identity revealed](#)

[Calls for greater transparency over 'toxic' new fish farm product](#)

[Fish farm companies 'bidding to use bee-harming pesticide'](#)

[Letter to SEPA: Please Come Clean on Imidacloprid!](#)

[Letter to Scottish Ministers, SEPA & the VMD re. Imidacloprid](#)

[FOI requests on Imidacloprid to SEPA, VMD & the Scottish Government](#)

[Revealed: Toxic Neonicotinoid Insecticide Used to 'CleanTreat' Lousy Salmon](#)

[New lice treatment now in hands of regulators](#)

[Sea Lice Clean Treat](#)

[Media coverage of Benchmark's 'CleanTreat', Ectosan and BMK08](#)

[Please Come Clean on BMK08!](#)

[Official fears revealed over toxic threat of salmon trade](#)

[Cleaning Tox-Sick Scottish Salmon](#)

[CleanTreat: FOI Disclosures by the Scottish Government to Scottish Salmon Watch](#)

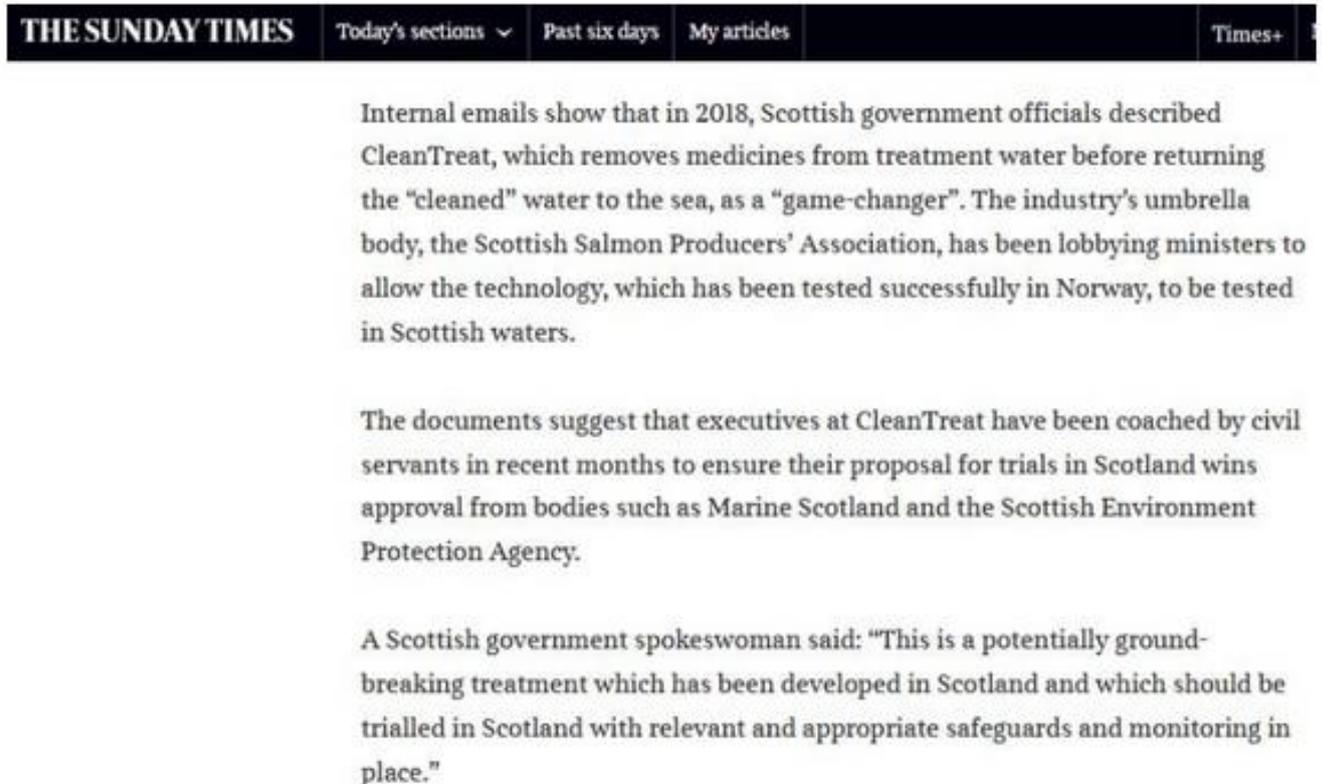
[ASC interpretation request for Imidacloprid by Mowi Norway](#)

[All is Not Well With Sick Scottish Salmon](#)



## Media Backgrounder:

In December 2019, The Sunday Times [revealed political support for trials of toxic chemicals via 'CleanTreat'](#).



In December 2019, A [Freedom of Information disclosure by the Scottish Government](#) to Scottish Salmon Watch [revealed](#) that trials of BMK08 (Ectosan) were being promoted by the Cabinet Secretary for Rural Economy.

In February 2020, Scottish Salmon Watch [appealed to the Scottish Information Commissioner regarding the refusal of SEPA to disclose information on BMK08/Ectosan and asked the Scottish Government to review their refusal to disclose information.](#)

In March 2020, The Ferret first [revealed that Ectosan \(BMK08\) was the toxic neonicotinoid Imidacloprid](#) (Scottish Salmon Watch [stumbled upon the disturbing news following a tip-off](#)).

In March 2020, Scottish Salmon Watch [wrote to SEPA, Scottish Ministers, the VMD and the Norwegian Government](#) (trials of Imidacloprid have already taken place in Norway by the salmon farming industry with Fish Farmer [reporting in February 2020](#) that: "Over the past 24 months, more than 35,000 tonnes of salmon in five Norwegian farms have been treated with BMK08").

In May 2020, Scottish Salmon Watch [revealed that Mowi \(formerly Marine Harvest\) had asked for SEPA's support for a trial of Imidacloprid at their Ardnish salmon farm in Loch Ailort](#) (with a [FOI filed with the Scottish Government, SEPA and the VMD for more details on any trials of Imidacloprid](#)).

In May 2020, The Ferret & Sunday National [reported](#):

On 20 May [Ruskell wrote](#) to the Scottish environment minister, [Roseanna Cunningham](#), saying he was “deeply concerned” about a proposed trial of another fish farm pesticide branded as Ectosan, used to kill sea lice. The Ferret [reported in March](#) that the active ingredient was [imidacloprid](#), which is a neonicotinoid chemical blamed for harming bees.

In May 2020, Scottish Salmon Watch [wrote to the Prince of Wales](#) asking if he supported the use of Imidacloprid by Royal Warrant holder Mowi.

Read more via:

["Scottish Greens "Deeply Concerned" at Mowi's Field Trial of Neonicotinoid Imidacloprid in Loch Ailort"](#)

["Mowi asks to trial new lice drug in Scotland"](#)

["What's Bad for Bees Could Be Bad for Marine Life, Too"](#)

["Follow the Salmooney - the Norwegian tobacco billionaire behind the Neonicotinoid Imidacloprid"](#)

["BMK08 & CleanTreat"](#)

["Benchmark sea lice treatment identity revealed"](#)

["Calls for greater transparency over 'toxic' new fish farm product"](#)

["Fish farm companies 'bidding to use bee-harming pesticide'"](#)

["New lice treatment now in hands of regulators"](#)

["Sea Lice Clean Treat"](#)

["Aquaculture biotech group Benchmark raises \\$50 million to launch new sealice treatment"](#)

["Benchmark seeks millions more for novel sea lice treatments"](#)

["Official fears revealed over toxic threat of salmon trade"](#)

["Benchmark: 'Breakthrough' salmon lice treatment combo could be available by end of 2020"](#)

["How the world's most widely used insecticide led to a fishery collapse - Neonicotinoids wiped out plankton and fish in a Japanese lake, and are likely harming aquatic ecosystems worldwide, new research suggest"](#)

["Oysters growers lose battle to use neonicotinoid"](#)

["Oyster growers agree to abandon quest to use controversial insecticide in Southwest Washington tidelands"](#)

["Pesticide banned in oyster farming"](#)

["As pesticide ban looms, oyster growers fear the worst"](#)

["Neonicotinoid pesticides killing songbirds by turning them 'anorexic'"](#)

["Fergus Ewing should stop Michael Russell on pesticides, says leaked email"](#)

["Alarm over toxic pesticide sprayed on Scotland's woodlands"](#)

["Groundbreaking new sea lice treatment: "All the trials have shown 100 per cent efficacy"”](#)

["Two-year wait for 'next generation' lice treatment"](#)

["New lice bath '100% effective' and pollution-free"](#)

["Patent sought for neonicotinoid-based sea louse treatment"](#)

["Chemotherapeutants against salmon lice \*Lepeophtheirus salmonis\* –screening of efficacy"](#)

["Dette er det nye lusemiddelet Salmo Pharma skal teste ut"](#)

["Neonicotinoids: Scottish government calls for ban to be delayed"](#)

## Notes to Editors:

[1] [Scientific & Media Backgrounder: Imidacloprid - A Neonicotinoid Insecticide Toxic to Aquatic Life](#) (June 2020)

[FOI to Scottish Ministers, the Scottish Environment Protection Agency and the Veterinary Medicines Directorate](#) (8 June 2020)



Scottish Ministers: [scottish.ministers@gov.scot](mailto:scottish.ministers@gov.scot)

Scottish Environment Protection Agency: [terry.ahearn@sepa.org.uk](mailto:terry.ahearn@sepa.org.uk)

Veterinary Medicines Directorate: [postmaster@vmd.defra.gsi.gov.uk](mailto:postmaster@vmd.defra.gsi.gov.uk)

5 June 2020

### Scientific Concerns re. Imidacloprid Use in Scottish Salmon Farming

Further to Scottish Salmon Watch's [FOI request dated 20 May 2020](#) and [letter dated 17 March 2020](#) (both re-enclosed below for easy reference), could you please provide information on any scientific risk assessments of the ecosystem impacts of Imidacloprid (BMK08/Ectosan) in salmon farming?

Including:

Scottish Salmon Watch's [letter to SEPA dated 17 March 2020](#) (also enclosed below) included the following (as yet unanswered) questions:

- What scientific research has SEPA conducted on the toxicity and environmental impact of Imidacloprid?
- Will SEPA be publishing a scientific dossier on environmental impacts of Imidacloprid ([as SEPA has done so via Emamectin benzoate](#))?
- Will SEPA be conducting scientific studies and monitoring of impacts of Imidacloprid ([as it has done so via Emamectin benzoate](#))?
- Will Bayer/Monsanto be making available to the public their 'Confidential' work on Imidacloprid ([or will the chemical company behind Imidacloprid be taking the Merck behind the scenes route](#))?

And:

Could you please share any information you have detailing how Benchmark can magically make Imidacloprid disappear from wastewater effluent discharges?

Scottish Salmon Watch is highly dubious and despite being a fan of Paul Daniels, David Copperfield, Criss Angel, Harry Houdini and other great magicians cannot believe how Benchmark can remove Imidacloprid completely and pollution-free from effluents.

And concludes with:

Has SEPA, VMD and/or the Scottish Government conducted any modelling of environmental impacts or any ecological risk assessments of Imidacloprid use in salmon farming?

The public has a right to know the [scale of ecological and environmental impacts of Imidacloprid](#) PRIOR to its use in Scottish salmon farms. Playing a game of ecological roulette in Scottish waters is simply unacceptable and leaves a bad taste in the mouth.



[2] [Imidacloprid is a neonicotinoid insecticide in the chloronicotinyl nitroguanidine chemical family.](#) [Imidacloprid is an insecticide that was made to mimic nicotine.](#)

The [European Union banned Imidacloprid in 2018 for use in terrestrial agriculture](#) following [scientific evidence published by the European Food Safety Authority](#). "The EU extension of the ban on the three neonicotinoids to all outdoor uses is excellent news," said Christopher Connolly, a neurobiologist at the University of Dundee, and expert on pesticide toxicity in bees, [in a statement circulated by the UK Science Media Centre](#).

## Imidacloprid

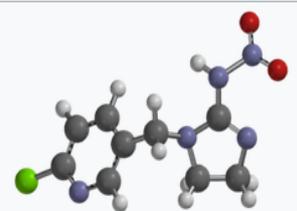
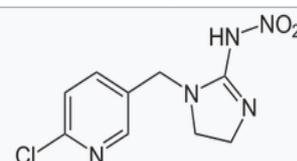
From Wikipedia, the free encyclopedia

**Imidacloprid** is a systemic [insecticide](#) that acts as an [insect neurotoxin](#) and belongs to a class of chemicals called the [neonicotinoids](#) which act on the [central nervous system](#) of insects. The chemical works by interfering with the transmission of stimuli in the insect nervous system. Specifically, it causes a blockage of the [nicotinic neuronal pathway](#). By blocking [nicotinic acetylcholine receptors](#), imidacloprid prevents [acetylcholine](#) from [transmitting](#) impulses between nerves, resulting in the insect's paralysis and eventual death. It is effective on contact and via stomach action.<sup>[1]</sup> Because imidacloprid binds much more strongly to insect neuron [receptors](#) than to mammal neuron receptors, this [insecticide](#) is more toxic to insects than to mammals.<sup>[2]</sup>

As of 1999, imidacloprid was the most widely used insecticide in the world.<sup>[3]</sup> Although it is now off patent, the primary manufacturer of this chemical is Bayer CropScience (part of [Bayer AG](#)). It is sold under many names for many uses; it can be applied by soil injection, [tree injection](#), application to the skin of the plant, broadcast foliar, ground application as a granular or liquid formulation, or as a pesticide-coated [seed treatment](#).<sup>[4][5]</sup> Imidacloprid is widely used for pest control in agriculture. Other uses include application to foundations to prevent termite damage, pest control for gardens and turf, treatment of domestic pets to control fleas,<sup>[2]</sup> protection of trees from boring insects,<sup>[6]</sup> and in preservative treatment of some types of lumber products.<sup>[7]</sup>

[Contents](#) [\[hide\]](#)

**Imidacloprid**<sup>[1]</sup>



### Names

IUPAC name

*N*-(1-((6-Chloro-3-pyridyl)methyl)-4,5-dihydroimidazol-2-yl)nitramide

## PubChem Imidacloprid (Compound)

### 12 Safety and Hazards



#### 12.1 Hazards Identification



##### 12.1.1 GHS Classification



Showing 1 of 4 [View More](#)

Pictogram(s)	 Irritant      Environmental Hazard
Signal	<b>Warning</b>
GHS Hazard Statements	H302: Harmful if swallowed <a href="#">[Warning Acute toxicity, oral]</a> H400: Very toxic to aquatic life <a href="#">[Warning Hazardous to the aquatic environment, acute hazard]</a> H410: Very toxic to aquatic life with long lasting effects <a href="#">[Warning Hazardous to the aquatic environment, long-term hazard]</a>

Imidacloprid, [according to the Material Safety Data Sheet of one of the insecticide formulations on the market](#), is "highly toxic to aquatic invertebrates" and the chemical company warns users "do not apply directly to water" and "do not contaminate water when disposing of equipment washwaters".

## MATERIAL SAFETY DATA SHEET

### Quali-Pro® Imidacloprid 2F Turf & Ornamental

#### 12. ECOLOGICAL INFORMATION

**ENVIRONMENTAL HAZARDS:** This product is highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

This chemical demonstrates the properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

Another [Imidacloprid formulation warns](#):

## Kohinor 350 SC

Synonyms

Imidacloprid 350 SC



Signal word

Warning

Hazard Statements

H410 - Very toxic to aquatic life with long lasting effects

Precautionary Statements

P102 - Keep out of reach of children

P501 - Dispose of contents/ container to an approved waste disposal plant

More information on 'Marine Pollutant' labelling is [available via ChemSafe Pro](#):



**Environmentally hazardous  
substance mark**

Read more via "[Environmentally Hazardous Labels](#)":

## LABELLING & MARKING MARINE POLLUTANTS

If a package containing a marine pollutant is to travel by sea at any time during transport, you must comply with the more stringent IMO regulations and label and mark as such.



[3] North America Aquaculture [reported in April 2018](#):

## Aquaculture North America

[MENU](#) [NEWS](#) [FEATURES](#) [PRODUCTS](#) [OPINION](#) [EVENTS](#) [ENEWS](#) [MAGAZINE](#) -

### Pesticide banned in oyster farming

The Washington Department of Ecology has banned a pesticide that was approved two years ago for oyster growers to kill burrowing shrimp.

The department said it made the decision after a lengthy evaluation of the environmental impacts of the pesticide, imidacloprid. The pesticide belongs to a class of chemicals called the neonicotinoids, which act on the central nervous system of insects.

The state announced Monday that it is too harmful to the ecosystem and decided to deny a request for its approval.

“The science around imidacloprid is rapidly evolving and we can’t ignore it. New findings make it clear that this pesticide is simply too risky and harmful to be used in Washington’s waters and estuaries,” state Ecology Director Maia Bellon said in a press release.

The Associated Press [reported in December 2019](#):

## Oyster growers abandon push to use imidacloprid, a controversial insecticide

| Associated Press  
Updated 2:46 AM EST Dec 13, 2019

LONG BEACH, Wash. (AP) — A southwest Washington oyster growers association has abandoned a drive to use a controversial insecticide that combats burrowing shrimp, a creature that can make tidelands unfit for shellfish farming.

The Seattle Times reports that in a settlement reached last week, the Willapa Grays Harbor Growers Association agreed to accept a 2018 state Ecology Department denial of the proposed use of imidacloprid and drop an appeal to the state Pollution Control Hearings Board.

The growers wanted to use the insecticide to spray up to 500 annually of the more than 12,000 acres of tidelands used for shellfish cultivation in Willapa Bay and Grays Harbor. Without the spray, the growers say they lose productive tidelands to the shrimp, which churn up sediment and can cause oysters, as well as clams, to suffocate in the muck.

[4]

From: **Don Staniford** <[salmonfarmingkills@gmail.com](mailto:salmonfarmingkills@gmail.com)>  
Date: Fri, May 29, 2020 at 3:17 PM  
Subject: Re: Field trials of Imidacloprid (BMK08/Ectosan) in Scotland?  
To: Rachel Aninakwah <[rachel.aninakwah@bmkholdings.com](mailto:rachel.aninakwah@bmkholdings.com)>

Thanks - can you please share copies of any environmental assessments of Imidacloprid use?

From: **Rachel Aninakwah** <[rachel.aninakwah@bmkholdings.com](mailto:rachel.aninakwah@bmkholdings.com)>  
Date: Fri, May 29, 2020 at 2:59 PM  
Subject: Re: Field trials of Imidacloprid (BMK08/Ectosan) in Scotland?  
To: Don Staniford <[salmonfarmingkills@gmail.com](mailto:salmonfarmingkills@gmail.com)>

Dear Don,

Thank you for your inquiry and for your interest. We are currently unable to accept visits. For more information on our treatment system, please visit <https://www.benchmarkplc.com/news/bmk08/>

Kind regards,  
Rachel

**RACHEL ANINAKWAH**  
COMMUNICATIONS MANAGER



Benchmark®

T. +44 (0) 203 696 0630  
[rachel.aninakwah@bmkholdings.com](mailto:rachel.aninakwah@bmkholdings.com)  
[benchmarkplc.com](http://benchmarkplc.com)  
14 Red Lion Square, London WC1R 4QH

**From:** Don Staniford <[salmonfarmingkills@gmail.com](mailto:salmonfarmingkills@gmail.com)>  
**Date:** Wednesday, 20 May 2020 at 10:20  
**To:** Rachel Aninakwah <[rachel.aninakwah@bmkholdings.com](mailto:rachel.aninakwah@bmkholdings.com)>  
**Subject:** Field trials of Imidacloprid (BMK08/Ectosan) in Scotland?

Rachel,

Could you please provide details of any field trials of Imidacloprid (BMK08/Ectosan) in Scotland?

I understand that in March this year Mowi asked SEPA to support a field trial at Ardnish in Loch Ailort.

Details via [Secret Trials: 'Royal' Salmon Doused with Bee-Killing Insecticide Imidacloprid?](#)

And Tweeted via <https://twitter.com/TheGAAIA/status/1263009166462984192>

Would it be possible to arrange a site visit to monitor the field trial (once lockdown permits)?

Your email in January stated that: "The CleanTreat system is demobilised until further trials are planned so we are unable to offer a visit at this time."

Presumably trials are now back on? Where and when did trials take place prior to January 2020?

Thanks,

Don

**From:** Don Staniford <[salmonfarmingkills@gmail.com](mailto:salmonfarmingkills@gmail.com)>  
**Date:** Tue, Mar 17, 2020 at 11:14 AM  
**Subject:** Imidacloprid - environmental assessment documents & briefings?  
**To:** Rachel Aninakwah <[rachel.aninakwah@bmkholdings.com](mailto:rachel.aninakwah@bmkholdings.com)>

Rachel,

Do you have copies of any environmental assessment documents prepared by Benchmark relating to Imidacloprid (BMK08/Ectosan/D10 Aquatic Blast)?

When Schering Plough were preparing to launch SLICE (Emamectin benzoate) in the late 1990s they organised various briefing meetings with NGOs and other stakeholders.

Is Benchmark preparing to brief stakeholders on the use of Imidacloprid via CleanTreat?

You may be interested in:

[Revealed: Toxic Neonicotinoid Insecticide Used to 'CleanTreat' Lousy Salmon](#)

[The Ferret: "Fish farm companies 'bidding to use bee-harming pesticide'"](#)

Best fishes,

Don

On Thu, Jan 23, 2020 at 8:21 AM Rachel Aninakwah  
<[rachel.aninakwah@bmkholdings.com](mailto:rachel.aninakwah@bmkholdings.com)> wrote:

Dear Don,

Many thanks for your interest in Benchmark's CleanTreat purification system.

Our new sea lice treatment, BMK08, is currently in development phase and is therefore commercially sensitive and due to regulations we are constrained about the extent to which we can provide information. The CleanTreat system is demobilised until further trials are planned so we are unable to offer a visit at this time.

We would be happy to share with you the publicly available information on CleanTreat in the meantime. The CleanTreat webpage [here](#) explains the CleanTreat process in more detail.

Kind regards,  
Rachel

**RACHEL ANINAKWAH**  
COMMUNICATIONS MANAGER



**Benchmark**<sup>®</sup>

T. +44 (0) 203 696 0630

[rachel.aninakwah@bmkholdings.com](mailto:rachel.aninakwah@bmkholdings.com)

[benchmarkplc.com](http://benchmarkplc.com)

[14 Red Lion Square, London WC1R 4QH](#)

**From:** Don Staniford <[salmonfarmingkills@gmail.com](mailto:salmonfarmingkills@gmail.com)>

**Sent:** 29 December 2019 10:59

**To:** [info@benchmarkplc.com](mailto:info@benchmarkplc.com); [marie-clare.russell@faifarms.com](mailto:marie-clare.russell@faifarms.com)  
**Cc:** Benchmark @ MHP <[Benchmark@mhpc.com](mailto:Benchmark@mhpc.com)>; [presse@ferd.no](mailto:presse@ferd.no)  
**Subject:** Visit to CleanTreat's operations in early 2020?

Would it be possible to visit your CleanTreat operations during early 2020?

Scottish Salmon Watch is interested in tracking this technology and would like further information on BMK08 in particular.

You may be interested in today's news article in The Sunday Times and press release:

- [Press Release: "Cleaning Tox-Sick Scottish Salmon"](#)
- [Sunday Times: "Official fears revealed over toxic threat of salmon trade"](#)

Earlier this year I emailed Benchmark requesting a visit to your Ardtoe facility but did not receive a reply.

Best fishes for 2020,

Don Staniford

Director, Scottish Salmon Watch

[5]

From: **Andrew Saunders** <a.saunders@vmd.gov.uk>  
Date: Thu, Jun 4, 2020 at 3:32 PM  
Subject: Official Sensitive: Response to ATI0655  
To: Don Staniford <salmonfarmingkills@gmail.com>

Dear Don,

Thank you for your email dated 5th May 2020.

### **Your Request**

You asked for 'documents detailing the date when Imidacloprid become first known in the context of salmon farming to the Veterinary Medicines Directorate (VMD)' – this is in relation to Imidacloprid (BMK08/Ectosan/D10 Aquatic Blast) including discharges and disposals via Benchmark's 'CleanTreat' since 2014'.

### **Our Reply**

As a general point you should note that the Freedom of Information Act (FOIA) gives you an entitlement to information rather than documents and it is in this context that we have answered your request.

The following sets out the timeline when Imidacloprid become first known to the VMD in the context of salmon farming.

## June 2016 and again in October 2017

The VMD first became aware of imidacloprid in the context of salmon farming in June 2016 and again in October 2017. Please note that this interaction was not specifically in the context of Ectosan or CleanTreat but the active substance, imidacloprid. However, we can't say anything more about this as we consider that the disclosure of the information would be likely to prejudice the commercial interests of the business concerned and that Section 43 applies here. Section 43 is subject to a public interest test balance. After careful consideration we have concluded that the public interest in withholding the information strongly outweighs that for disclosure in this case. The information in question refers to the confidentiality afforded to companies when they first engage with regulators. If we identified the source and context of this information, it could in consequence prejudice the commercial interests of the business involved.

## December 2017 – Your initial FOI request on ‘Ectosan’ and ‘CleanTreat’

This was the first correspondence the VMD had with an external party on ‘Ectosan’ and ‘CleanTreat’. Subsequently, this led to us carrying out an internet search that highlighted these initiatives, to the VMD, from Benchmark.

The search highlighted that ‘Ectosan’ is a potential fish product to be used against sea lice that is being trialled in Norway (UK weren't included as part of these trials). These trials were in conjunction with a new purification system ‘CleanTreat’ which is a type of filtration system that can be used in Well Boats to remove the active substance from the treatment water.

We do not hold this information. In an effort to provide you with advice and assistance in accordance with the FOIA's code of conduct, we are providing you with the following Benchmark website link where you can find more background.

<http://www.benchmarkplc.com/articles/benchmark-announces-the-success-of-its-next-generation-sea-lice-treatment-ectosan-during-its-first-commercial-scale-field-trials/>

## March 2018 - Presentation made at the Fish Vet Society on the ‘CleanTreat’ system.

This was the first presentation that the VMD attended on these topics. Again, we do not hold this information - to provide you with advice and assistance in accordance with the FOIA's code of conduct, you can find a summary of this part of the meeting in this link:

<https://thefishsite.com/articles/innovative-treatment-system-gets-an-upgrade>

## **Information releasable to the public**

In keeping with the spirit and effect of the FOIA and the government's Transparency Agenda, we may place this request on [GOV.UK](http://gov.uk), in due course. We will not place information identifying you on the [GOV.UK](http://gov.uk) website.

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Copyright in other documents may rest with a third party. For information about obtaining permission from a third party see the Intellectual Property Office's website.

### **Our Service**

If you are unhappy with the service you have received in relation to your request and wish to make a complaint, you may request an internal review within two calendar months of the date of this e-mail. If you would like to request an internal review please write to the VMD via [ati@vmd.gov.uk](mailto:ati@vmd.gov.uk). If you are not content with the outcome of the internal review you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Many thanks

Andrew Saunders  
Freedom of Information Officer

From: **Don Staniford** <salmonfarmingkills@gmail.com>  
Date: Tue, May 5, 2020 at 5:33 PM  
Subject: Re: Official Sensitive – Result of ATI0645 Internal Review  
To: Mike Griffiths <m.griffiths@vmd.gov.uk>

Mike,

Thanks - that's disappointing but not surprising.

Could you not disclose redacted documents detailing the date when Imidacloprid become first known in the context of salmon farming to the VMD?

Don

From: **Mike Griffiths** <m.griffiths@vmd.gov.uk>  
Date: Tue, May 5, 2020 at 1:44 PM  
Subject: Official Sensitive – Result of ATI0645 Internal Review  
To: salmonfarmingkills@gmail.com <salmonfarmingkills@gmail.com>

Dear Mr Staniford,

Your request

Thank you for your email dated 9th April 2020. You asked the Veterinary Medicines Directorate (VMD) to carry out an internal review under the Freedom of Information Act 2000 (FOIA) of its reply dated 9th April 2020 - VMD ref: ATI0645 - in the terms set out below:

You asked for “information on Imidacloprid (BMK08/Ectosan/D10 Aquatic Blast) including discharges and disposals via Benchmark's 'CleanTreat' since 2014.

Our reply

After careful consideration of your case, I am satisfied that the VMD acted properly in dealing with your request in accordance with the FOIA.

First, it set out clearly that the VMD considered the information relating to any new sea lice chemicals/treatments/medicines for use on salmon farms in Scotland is material that is still in the course of completion and data that are incomplete.

It then gave you a legally valid reason for not providing the information, citing the exception in regulation 12(4)(d) of the EIRs. It went on to explain that Reg 12(4)(d) relates to unfinished documents or incomplete data: and that any application to the VMD or assessment by the VMD would at this stage be unfinished.

It concluded that after careful consideration the public interest in withholding the information you requested strongly outweighed that for disclosure in this case. It explained that the VMD judged that there is a strong public interest in allowing parties the safe space to conclude their data gathering to achieve the finalisation of the process and the establishment of a defined data set; and that the VMD judge it is in the public interest not to hinder VMD's ongoing relationship with applicants in this process.

I am satisfied that this is a legally valid reason for withholding the information, that the VMD set out its position clearly; and that the VMD met its obligation to be open and transparent by setting out its case in this way.

Our Service

If you are not content with the outcome of the internal review you have the right to apply directly to the Information Commissioner for a decision. You can contact the Information Commissioner at:

Information Commissioner's Office  
Wycliffe House

Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Yours sincerely  
Mike Griffiths  
Head of Business Support Division

From: **Don Staniford** <salmonfarmingkills@gmail.com>  
Date: Thu, Apr 9, 2020 at 10:25 AM  
Subject: Review request re. ATI0645  
To: <ati@vmd.gov.uk>  
Cc: <a.saunders@vmd.gov.uk>

Please consider this a formal request for a review of the VMD's FOI refusal via ATI0645.

Surely there are some documents which are available?

Surely you can redact names and make some information publicly available?

A blanket refusal is unreasonable especially in view of the public interest in this issue:

[ENDS Report: "Calls for greater transparency over 'toxic' new fish farm product"](#)  
[Letter to SEPA: Please Come Clean on Imidacloprid!](#)  
[Follow the Salmoney - the Norwegian tobacco billionaire behind the Neonicotinoid Imidacloprid](#)  
[The Ferret: "Fish farm companies 'bidding to use bee-harming pesticide'"](#)  
[Revealed: Toxic Neonicotinoid Insecticide Used to 'CleanTreat' Lousy Salmon](#)  
[Please Come Clean on BMK08!](#)

Please therefore review your refusal and provide some documents.

At the very least please itemise the documents which have been refused.

Please provide a receipt for this review request.

Thanks,

Don Staniford

Director, Scottish Salmon Watch

From: **Andrew Saunders** <a.saunders@vmd.gov.uk>  
Date: Thu, Apr 9, 2020 at 9:49 AM  
Subject: Official Sensitive: Response to Freedom of Information request ATI0645  
To: [salmonfarmingkills@gmail.com](mailto:salmonfarmingkills@gmail.com) <[salmonfarmingkills@gmail.com](mailto:salmonfarmingkills@gmail.com)>

Dear Don,

Thank you for your email below, dated 17th March 2020.

We are dealing with it under the Environmental Information Regulations (EIRs) 2004.

**Your Request:**

You asked for “information on Imidacloprid (BMK08/Ectosan/D10 Aquatic Blast) including discharges and disposals via Benchmark's 'CleanTreat' since 2014. Background details on this FOI request are available online here - and attached as a PDF.’

**Our Reply:**

We acknowledge the background details that you attached to your request, and thank you for them. As with similar recent requests from yourself, we consider that information relating to any new sea lice chemicals/treatments/medicines for use on salmon farms in Scotland is material that is still in the course of completion and data that are incomplete; and that the exception in regulation 12(4)(d) of the EIRs applies. Reg 12(4)(d) relates to unfinished documents or incomplete data: any application to the VMD or assessment by the VMD would at this stage be unfinished.

We judge that there is a strong public interest in allowing parties the safe space to conclude their data gathering to achieve the finalisation of the process and the establishment of a defined data set. We also judge it is in the public interest not to hinder VMD’s ongoing relationship with applicants in this process.

Information releasable to the public:

In keeping with the spirit and effect of the FOIA and the government’s Transparency Agenda, we may place this request on [GOV.UK](http://GOV.UK), in due course. We will not place information identifying you on the [GOV.UK](http://GOV.UK) website.

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Copyright in other documents may rest with a third party. For information about obtaining permission from a third party see the Intellectual Property Office’s website.

**Our Service:**

If you are unhappy with the service you have received in relation to your request and wish to make a complaint, you may request an internal review within two calendar months of the date of this e-mail. If you would like to request an internal review please write to the VMD via [ati@vmd.gov.uk](mailto:ati@vmd.gov.uk).

If you are not content with the outcome of the internal review you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Many thanks

Andrew Saunders  
Freedom of Information Officer

From: **Don Staniford** <salmonfarmingkills@gmail.com>  
Date: Tue, Mar 17, 2020 at 12:42 PM  
Subject: FOI re. Imidacloprid (BMK08/Ectosan/D10 Aquatic Blast) since 2014  
To: <postmaster@vmd.defra.gsi.gov.uk>  
Cc: Sandra Russell <s.russell@vmd.gov.uk>

Please provide information on Imidacloprid (BMK08/Ectosan/D10 Aquatic Blast) including discharges and disposals via Benchmark's 'CleanTreat' since 2014.

Background details on this FOI request are available [online here](#) - and attached as a PDF.

Please therefore provide the information requested which may involved re-visiting previous FOI requests.

Please consider this a formal request for information via the relevant FOI and Environmental Information regulations.

Please provide the information electronically and/or online.

Please provide a receipt of this FOI request.

Thanks,

Don Staniford

Director, [Scottish Salmon Watch](#)